



Oral Presentation

October 22, 2013

Telecom Notice of Consultation CRTC 2013-155

Issues related to the feasibility of establishing a video relay service



1. (Ted) Good afternoon Mr. Chairman and Commissioners. My name is Ted Woodhead, and I am Senior Vice-president, Federal Government and Regulatory Affairs for TELUS. We are pleased to have the opportunity to talk to you today about the feasibility of establishing a video relay service in Canada.
2. Appearing with me today are Eric Edora, Director, Regulatory Affairs, Andrea Mazerolle, Operations Manager, Operator Services and Isabelle Morneau, Senior Regulatory Advisor.
3. At TELUS, we have the objective to put Customers First in everything we do. "Putting Customers First" includes making sure our products and services are as accessible as possible for all of our customers. TELUS has always accepted its responsibilities to deliver accessible telecommunications to Canadians and is proud of its historical record in this regard.
4. Many years ago, TELUS recognized that VRS would mark an important opportunity for enhancing accessibility of telecommunications services. By allowing deaf and speech impaired Canadians to use telecommunications in their primary language, sign language, VRS would eliminate many of the difficulties these persons might experience when using traditional voice telephone service. Also, as a telecommunications provider with significant experience in delivering traditional message relay and IP-relay services,

TELUS wanted to investigate whether VRS would be a compatible offering with its other operator services.

5. Therefore we decided some years ago to undertake a VRS trial with customers in selected communities in Alberta and British Columbia. This trial would allow us so to gather data regarding implementation, service delivery and customer response to VRS in Canada.
6. TELUS and our trial partner Sorenson conducted the 18-month VRS trial in Vancouver, Calgary and Edmonton. Our trial included 306 customers in these cities, with TELUS installing videophones in residences, schools and some businesses. As a result, trial participants had access to VRS at their homes, at their businesses and in their schools.
7. This trial was a success in that it demonstrated an overwhelming positive response for VRS from trial participants. In our survey responses, we heard that VRS allowed them, for example to call friends and family without the delays associated with traditional relay services, to participate in work teleconferences in an interactive manner and to be able to make calls to set up arrangements such as health care appointments, travel or other personal engagements. We also heard yesterday about the difficulties encountered when deaf persons need to contact someone to deal with everyday occurrences, such as when their car breaks down or if they are going to be home late from work. These are conveniences that are taken for granted by

- non-hard of hearing persons. However, for many of our trial participants, it marked the first time that they were able to experience these same daily conveniences.
8. Most importantly, trial participants told us that VRS finally freed them from the limitations of text communications and allowed them to conduct their conversations in their primary language. Finally, they could use telecommunications in a manner where they could convey their tone, emotions and feelings in their own voice. Because of this trial and the customer response to the service, TELUS strongly supports the implementation of VRS in Canada.
 9. (Andrea) We are confident that the results from our VRS trial give the Commission a sense of the significant pent-up demand for VRS amongst the deaf and hard-of-hearing community in Canada. We have reviewed the submissions filed by the interested parties to this proceeding, as well as the numerous consumer comments received by the Commission. We are certainly not surprised by the strong support for the establishment of VRS in Canada. This is completely consistent with what we learned from our trial.
 10. Of course, the reason that we are at this proceeding is because we recognize that implementation of VRS comes with some special considerations. Our trial was made possible from a \$3.2M spend from TELUS' deferral account dedicated to accessibility of telecommunications products and services, and

initially we had thoughts to potentially offer the service directly in the future. However, it became quickly apparent that VRS does not fit within TELUS' operator services portfolio.

11. Provision of VRS requires specialized skills and a deep understanding of the deaf culture. The single most important competency, and the most expensive component of the service, is the sign-language interpretation that allows a deaf person to converse in sign language to another person who does not sign. These are skills vastly different from those required to provide traditional message relay services such as TTY relay and IP-Relay. This is why TELUS strongly believes that the CRTC should not require any specific telecommunications service provider to provide VRS, because most would lack these skills.
12. Companies that offer VRS in other countries are specialized VRS providers that have developed competencies in delivering the service. Notably, in the US, where VRS is offered 24 x 7, not a single VRS provider is a TSP. TELUS anticipates that the Canadian experience would be similar, where VRS would be provided by a specialized VRS provider, which provider does not have to be a TSP.
13. TELUS does not support using the current funding model for text message relay services, where the cost of the services are recovered from a per telephone line tariff, for VRS. We also observe that many of the parties

representing the deaf and hard-of-hearing community do not support such a model. Our main opposition stems from the fact that it assumes that VRS is obtained through a local exchange line, when it is a video connection over the Internet. In fact, a local telephone is unnecessary for a customer to obtain VRS.

14. In addition, the current traditional relay services tariff is required to maintain those services, which must still be offered in the marketplace. A considerable number of customers would continue to rely on MRS and IP-relay, even if VRS were available.
15. (Eric) We recognize that the implementation and ongoing provision of VRS will pose significant costs, though the exact amount remains largely unknown. On the record of this proceeding, the Commission received cost estimates from two different sources. The Mission VRS Feasibility Study assumed approximately 15,000 potential users in Canada, an average usage of 37 minutes per month per user and a per minute VRS rate of \$4.30. At the fully operational phase, Mission estimates annual VRS costs of \$32 million.
16. On the other hand, Sorenson assumed 25,000 VRS potential users with an average usage of 60 minutes per month per user, and per minute relay rates set at \$5.94, declining over time to \$5.53. These assumptions result in annual VRS costs at a fully operational stage at over \$103 million.

17. These two estimates vary widely. This indicates that there are significant variables that are still uncertain. TELUS is of the view that the Commission has to ensure that VRS is provisioned in an efficient manner, while also preserving the integrity of the future VRS fund. In other words, a competitive procurement process that results in selecting a service provider that meets defined service characteristics at the lowest possible costs.
18. Therefore, we propose that the CRTC, in its determinations in this proceeding, direct that VRS be implemented by first employing a three-year phase-in implementation period. For this phase-in period, a single provider would be chosen after an RFP process. The RFP would be conducted based on specific service parameters, including hours of operation, quality of service standards such as interpreter requirements and call response times, and equal availability of ASL and LSQ interpretation. We also agree that VRS should support interoperability, so that VRS could be supported across various devices. The record of this proceeding should provide the Commission with suitable evidence upon which to make these determinations. Responses to the RFP would then set out proposed rates for per minute compensation, and a winner then selected.
19. We also propose that the CRTC undertake a review of VRS near the end of the three-year phase-in period. As part of this review, the VRS provider would be asked to file a detailed report documenting user statistics and costs. These

- data would be used by the Commission to set a VRS per-minute compensation rate for a full scale 24x7 VRS, to be implemented at the end of the initial three-year period. That full implementation would also be subject to an RFP process.
20. TELUS agrees with the general sentiment of many parties, including most of the advocacy groups, that VRS should be funded through a national fund, managed by an independent entity. TSPs, including wireline, wireless and Internet service providers, would contribute to this fund, based on a set percentage of their revenues. Therefore, the obligatory role of the TSPs in Canada for VRS is to contribute to the service funding, but not to offer VRS themselves.
21. As such, as part of its determinations here, the CRTC should direct a CISC committee to set up a consortium dedicated to VRS funding and administration, similar to the consortium for the national contribution fund. This CISC committee could also design the RFP for the three-year implementation period, based on the specific service parameters set out by the CRTC. Once the consortium is running, it can immediately undertake the RFP process and select the VRS provider for the first three years.
22. (Isabelle) Considérant le nombre limité d'interprètes en langages signés, TELUS est d'accord avec le fait que toute introduction du service de relais vidéo (SRV) soit basée sur un model fondé sur l'offre. Par conséquent, durant

cette période d'introduction progressive de trois ans, le SRV serait offert sur une base limitée, en fonction d'un horaire restreint. Il est aussi nécessaire que le SRV procure un accès équivalent pour les personnes communiquant soit en ASL ou en LSQ.

23. Toutefois, ceci soulève une question qui requiert une sérieuse analyse. La disponibilité des interprètes en langage des signes est une situation qui a été soulevée par plusieurs parties représentant les communautés de personnes sourdes et malentendantes. Il appert qu'une introduction du service de relais vidéo aura un impact sur la disponibilité des interprètes au niveau du travail d'interprétation dans la communauté. Nous comprenons, sur la base des commentaires reçus, que la situation est critique et requiert d'être soigneusement considérée et ce, pour les deux langues signées. Nous croyons qu'une approche de mise en œuvre progressive du SRV permettra de tenir compte de la quantité disponible d'interprètes en langages signés.
24. Le rapport que le fournisseur de SRV devra déposer pendant la période d'introduction progressive pourrait indiquer tout type de problèmes rencontrés à différentes étapes de l'introduction concernant la disponibilité des interprètes en langages signés. De plus, si de tels problèmes sont identifiés durant la période initiale, ceci pourrait être apporté à l'attention du CRTC qui, en retour, pourrait instaurer les ajustements nécessaires reliés à la disponibilité du SRV de manière à atténuer toute pénurie d'interprètes.

25. TELUS a également la conviction que le SRV présente une formidable opportunité pour renforcer la capacité actuelle au niveau des compétences en interprétariat au Canada. Nous croyons qu'un SRV canadien fera en sorte que la vocation sera plus attrayante, simplement parce que les interprètes vont anticiper des perspectives d'emploi qui seront plus stables, enrichissantes et lucratives. Au fur et à mesure que la demande d'interprètes va croître, les institutions d'enseignement deviendront motivées à instaurer de nouveaux programmes de formation d'interprètes ou à améliorer leurs programmes de formation existants.
26. Le programme d'introduction progressive de trois ans laissera suffisamment de temps pour que le marché réagisse et se développe potentiellement vers une offre du SRV au Canada, 24 heures sur 24, 7 jours sur 7. En outre, au fur et à mesure que la quantité d'interprètes augmentera, cela augmentera le nombre d'interprètes disponibles pour offrir des services d'interprétation dans le cadre du SRV ou directement dans les communautés. TELUS est d'avis qu'un plan de mise en œuvre soigneusement élaboré jouera un rôle central dans la résolution des problèmes résultant de la quantité limitée des interprètes en langages signés.
27. (Ted) TELUS is thankful for the opportunity to add our voice to the important issues under consideration in this proceeding. Our proposal tries to bring solutions to the Commission so that VRS can be implemented relatively

quickly, and without disruption to the interpreter needs of the general community. We also believe that we have brought forward a realistic approach so that a 24x7 VRS service can be made available in Canada. We welcome any questions you may have.

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